



CRAIG M. REISER
114 WEST 47TH STREET
NEW YORK, NY 10036
212.728.2218
CREISER@AXINN.COM

March 14, 2024

Via ECF

The Honorable P. Kevin Castel
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

*Application
Granted.
SO ORDERED
PKH
3-19-24*

Re: *In re Google Digital Advertising Antitrust Litigation*, No. 21-md-03010 (PKC)
In re Google Digital Advertising Antitrust Litigation, No. 21-cv-07001 (PKC)
Singh v. Google LLC et al., No. 23-cv-03651 (PKC)
Stellman v. Google LLC et al., No. 23-cv-01532 (PKC)
In re Google Digital Publisher Litigation, No. 21-cv-07034 (PKC)
Associated Newspapers Ltd. v. Google LLC et al., No. 21-cv-03446 (PKC)
Gannett Co. Inc. v. Google LLC et al., No. 23-cv-05177 (PKC)

Dear Judge Castel:

We represent Google LLC, Alphabet Inc., and YouTube LLC (together, “Google”) and write in reference to Your Honor’s March 14, 2024 Memo Endorsement and Order, ECF No. 714 (the “Order”) adopting the proposal of the Publisher Class Plaintiffs that Google “[a]nswer all claims and allegations that survived a motion to dismiss by March 29, 2024; and either answer the state-law claims by March 29, 2024, or file a pre-motion letter to dismiss such claims by March 15, 2024.” ECF No. 713 at 2.

Google understands the schedule set forth in the Order to apply to each of the above-referenced actions that were the subject of Google’s March 11, 2024 letter. However, because the Publisher Class Plaintiffs’ proposal was submitted only as to the Publisher Class Plaintiffs’ claims, *see* ECF No. 713 at 1, and the Court endorsed the Publisher Class Plaintiffs’ request, Google respectfully requests that the Court clarify that the deadlines set forth in the Order apply to each of above-referenced matters.

Moreover, because Your Honor’s Order was entered this afternoon, Google respectfully requests that the March 15 deadline for Google to file pre-motion letter(s) to dismiss state-law claims be extended to March 19, 2024.

The Honorable P. Kevin Castel
March 14, 2024
Page 2

Respectfully submitted,

/s/ Craig M. Reiser

Craig M. Reiser
AXINN, VELTROP & HARKRIDER LLP
114 West 47th Street
New York, New York 10036
Telephone: (212) 728-2218
Email: creiser@axinn.com

/s/ Justina K. Sessions

Justina K. Sessions**
FRESHFIELDS BRUCKHAUS
DERINGER US LLP
855 Main Street
Redwood City, CA 94063
Telephone: 650-618-9250
Email: justina.sessions@freshfields.com

Counsel for Defendants Google LLC,
Alphabet Inc., and YouTube LLC

**Except as to *Associated Newspapers Ltd.*
v. *Google LLC*, No. 21-cv-03446 (PKC)

CC: All Counsel of Record (via ECF)